

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re SEPTEMBER 11 PROPERTY DAMAGE AND BUSINESS LOSS LITIGATION 21 MC 101 (AKH)

This Document Relates to:

*World Trade Center LLC et al. v.
United Airlines, Inc., et al.
08 Civ. 3719 (AKH)*

**DECLARATION OF
MICHAEL E. GORELICK**

*World Trade Center LLC et al. v.
American Airlines, Inc., et al.
08 Civ. 3722 (AKH)*

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Michael E. Gorelick, Esq., an attorney duly admitted to practice in this Court, declares the truth of the following statements under penalties of perjury:

1. I am a member of the firm of ABRAMS, GORELICK, FRIEDMAN & JACOBSON, P.C., attorneys for Intervenor Plaintiff, TIG Insurance Company, as subrogee of World Trade Center Properties LLC, 1 World Trade Center LLC, 2 World Trade Center LLC, 3 World Trade Center LLC, 4 World Trade Center LLC, and 7 World Trade Company, LP (collectively referred to as the "WTCP Plaintiffs").

2. This declaration is submitted in support of the motion by TIG pursuant to Rule 24 of the Federal Rules of Civil Procedure ("Fed R. Civ. P.") for leave to intervene as of right, or, in the alternative, by permission of this Court, in the individual actions referenced above (the "Actions") and interpose the accompanying proposed Complaints.

3. Annexed hereto as Exhibit "1" is TIG's proposed Complaint in the Action captioned *World Trade Center LLC et al. v. United Airlines, Inc., et al.*, bearing Index No. 08 Civ. 3719 (AKH), currently pending in this Court.

4. Annexed hereto as Exhibit "2" is TIG's proposed Complaint in the Action captioned *World Trade Center LLC et al. v. American Airlines, Inc., et al.*, bearing Index No. 08 Civ. 3722 (AKH), currently pending in this Court.

WHEREFORE, on the basis of the foregoing, it is respectfully submitted that this Court should enter an Order granting TIG's motion for leave to intervene as of right, or, in the alternative, by permission of this Court in the Actions, and interpose the accompanying proposed Complaints.

Dated: New York, New York
August 19, 2010



Michael E. Gorelick